

# KING & SPALDING

King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036-4003

Tel: (212) 556-2100  
Fax: (212) 556-2222  
www.kslaw.com

Scott Davidson  
Direct Dial: 212-556-2164  
sdavidson@kslaw.com

August 14, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On August 12, 2015, Lead Counsel filed a letter in the Second Circuit, referencing their previous motions seeking leave to intervene in and file oppositions to the petition and cross-petitions for leave to appeal the Court’s June 1, 2015 Judgment directly to the Second Circuit, and stating that they now “support immediate appeal to the Second Circuit as it will materially advance this litigation.” A copy of the letter is attached hereto as Exhibit “1.”
2. On August 13, 2015, Judge Furman entered an Order to Show Cause in Case No. 1:15-cv-06224 regarding Designated Counsel’s motion to withdraw the reference with respect to New GM’s motion to enforce the stay in the Judgment. A copy of the Order to Show Cause is attached hereto as Exhibit “2.”

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3. Today, August 14, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>1</sup> is attached hereto as Exhibit “3.”

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

SD/hs  
Encl.

cc: Edward S. Weisfelner  
Howard Steel  
Sander L. Esserman  
Jonathan L. Flaxer  
S. Preston Ricardo  
Matthew J. Williams  
Lisa H. Rubin  
Keith Martorana  
Daniel Golden  
Deborah J. Newman  
Jamison Diehl  
William Weintraub  
Steve W. Berman  
Elizabeth J. Cabraser  
Robert C. Hilliard

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<sup>1</sup> There are 28 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.